

The Honorable James L. Robart

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

MICROSOFT CORPORATION, a Washington  
corporation,

Plaintiff,

v.

MOTOROLA, INC., and MOTOROLA  
MOBILITY LLC, and GENERAL  
INSTRUMENT CORPORATION,

Defendants.

CASE NO. C10-1823-JLR

DEFENDANTS' CONSOLIDATED  
NONOPPOSITION TO MICROSOFT'S  
11/01/12 MOTION TO SEAL TRIAL  
EXHIBITS THAT DISCLOSE  
MICROSOFT'S TRADE SECRETS AND  
THIRD PARTIES' MOTIONS TO SEAL

**NOTED ON MOTION CALENDAR:  
Friday, November 9, 2012**

DEFENDANTS' CONSOLIDATED NONOPPOSITION TO  
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EXHIBITS THAT DISCLOSE MICROSOFT'S TRADE  
SECRETS AND THIRD PARTIES' MOTIONS TO SEAL  
CASE NO. C10-1823-JLR

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Defendants Motorola, Inc. (now Motorola Solutions, Inc.), Motorola Mobility LLC, and General Instrument Corporation (collectively “Motorola”) do not oppose Microsoft’s 11/1/12 Motion to Seal Trial Exhibits that Disclose Microsoft’s Trade Secrets (Dkt. No. 510). Motorola similarly does not oppose Nonparty International Business Machines Corporation’s Motion for a Limited Sealing Order (Dkt. No. 498), Nonparties Research In Motion Limited and Research In Motion Corporation’s Motion to Seal Term of Patent License Agreements and To Deny Microsoft In-House Counsel Access to the Agreements (Dkt. No. 502), Non-Party Ericsson Inc.’s Joinder In Defendants’ Motion to Seal Documents and Trial Testimony and Exclude Unauthorized Persons From the Courtroom During Testimony Regarding Sealed Information (Dkt. No. 515), and Non-Party MPEG LA LLC’s Joinder in Defendants’ Motion to Seal Documents (Dkt. No. 519).<sup>1</sup>

Nothing herein is intended as a waiver of Defendants’ right to contest Microsoft’s designation of material as Confidential Business Information in accordance with the terms of the Protective Order entered on July 21, 2011 (Dkt. No. 72). Defendants expressly reserve the right to do so as the circumstances warrant.

DATED this 7th day of November, 2012.

Respectfully submitted,

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By /s/ Ralph H. Palumbo

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<sup>1</sup> Rather than filing independent motions, nonparties VTech Communications, Inc. (Dkt. No. 508), LG Electronics, Inc. (Dkt. No. 518), Kyocera Corporation and Kyocera Communications, Inc. (Dkt. No. 522), and Koninklijke Philips Electronics N.V. (Dkt. No. 531) have joined Motorola’s Motion to Seal Documents and Trial Testimony and Exclude Unauthorized Persons From the Courtroom During Testimony Regarding Trade Secrets (Dkt. No. 495). Ericsson (Dkt. No. 515) and MPEG LA (Dkt. No. 519) have similarly indicated that they are joining Motorola’s motion.

By /s/ Thomas V. Miller

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***Attorneys for Motorola Solutions, Inc.,  
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Instrument Corp.***

**CERTIFICATE OF SERVICE**

I hereby certify that on this day I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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DATED this 7th day of November, 2012.

/s/ Marcia A. Ripley

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